

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

IN RE:

Thomas W. Zeiger

Case No. 20-49930-MLO

Chapter 13

Hon. Maria L. Oxholm

Debtor.

MOTION TO EXTEND THE AUTOMATIC STAY PURSUANT TO E.D. Mich. LBR 4001-4

NOW COMES Thomas W. Zeiger, Debtor herein, by and through his attorney, Charles J. Schneider, P.C. and moves this Court to extend the automatic stay in the above case as follows:

1. The Debtor commenced the within Bankruptcy case on 09/21/2020. Prior to the commencement of this case the Debtor had a pending Chapter 13 case filed in the Eastern District of Michigan on 10/22/2018, Case No. 18-54320-MBM. The pendency of the prior case was within one (1) year, but was dismissed.

2. That pursuant to 11 U.S.C. §362(c)(3)(B), the automatic stay will terminate with respect to the Debtor within 30 days from the date of filing.

3. That 11 U.S.C. §362(c)(3)(A), 11 U.S.C. §362(c)(3)(B) and E.D. Mich. LBR 4001-4 requires the Debtor to move this Court to extend the protection of the automatic stay within seven (7) days from the date of the filing of petition.

4. The Debtor requests that the automatic stay be extended until such time as the case is dismissed or a discharge is granted.

5. The Debtor states that the last case was dismissed because Debtor was unable to work on a consistent basis due to his disability. Debtor first became disabled in 2011 after experiencing a work place injury. As a direct result of the injury Debtor suffers from Reflex Sympathetic Dystrophy Disorder ("RSD"). Symptoms of RSD includes burning pain, swelling and stiffness in joints, motor disability, and decreased

ability to move affected body part. Though Debtor had employment during his last bankruptcy, the amount of hours he could work was significantly reduced because the RSD caused him to suffer from near debilitating pain and limited mobility.

6. The Debtor states that there has been a significant change in circumstances such that the Debtor would be able to complete a confirmed Chapter 13 plan. The change in circumstances are that Debtor has control over his RSD. Debtor has worked with his doctors to learn how to better manage his pain and any mobility issues. As a result Debtor is able to work longer hours and has been doing so since his last case was dismissed. On average he is working 25-30 hours each week. His employment combined with his disability income will allow Debtor to maintain his plan payment and complete the bankruptcy,

7. The Debtor has not had any other bankruptcy case pending within one (1) year prior to filing this case.

Wherefore, Debtor requests that the automatic stay under §362(c)(3)(B) be extended until such time as the case is dismissed or a discharge is granted.

/s/ Mary Beth Wimberley
CHARLES J. SCHNEIDER (P27598)
NICHOLAS D. CHAMBERS (P72084)
MARY BETH WIMBERLEY (P82137)
Attorneys For Debtor(s)
39319 Plymouth Rd., Ste. 1
Livonia, MI 48150
(734) 591-4890
notices@cschneiderlaw.com

Dated: September 28, 2020

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

IN RE:

Thomas W. Zeiger

Case No. 20-49930-MLO

Chapter 13

Hon. Maria L. Oxholm

Debtor.

/

**ORDER GRANTING EXTENSION OF AUTOMATIC
STAY PURSUANT TO E.D. Mich. LBR 4001-4**

This matter having come on to be heard upon the Debtor's Motion to Extend Automatic Stay pursuant to E.D. Mich. LBR 4001-4, a hearing having been held on _____, due notice having been thus given, and the Court being fully advised in the premises:

NOW THEREFORE IT IS HEREBY ORDERED that the automatic stay under 362(c)(3)(B) is extended until such time as the case is dismissed or a discharge is granted.

EXHIBIT 1

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

IN RE:

Thomas W. Zeiger

Case No. 20-49930-MLO

Chapter 13

HON. Maria L. Oxholm

Debtor.

AFFIDAVIT OF DEBTOR

Thomas W. Zeiger, Debtors, being first duly sworn, deposes and says:

1. The within Chapter 13 Petition was filed on my behalf on 09/21/2020.
2. My last case was dismissed because I lost income due to suffering from Reflex Sympathetic Dystrophy Disorder (RSD). This disorder is caused by a work injury I sustained in 2011. RSD caused me to experience near debilitating pain and limited mobility. These symptoms impacted my ability to work longer hours in order to maintain my plan payments and reasonable living expenses.
3. There has been a significant change in circumstances such that I would be able to complete a confirmed Chapter 13 plan. The change in circumstances are that my RSD is now under control. I have worked with my doctors and have learned how to manage my pain and to compensate for any mobility issues. Since my last case I have been working more hours, and am averaging 25-30 hours per week.

Furthermore, Deponent sayeth not.

I declare and affirm under penalty of perjury that I have read the foregoing averments and the statements above are true and correct to the best of my knowledge, information and belief.

/s/ Thomas W. Zeiger
Thomas W. Zeiger, Debtor

Dated: September 28, 2020

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

IN RE:

Thomas W. Zeiger

Case No. 20-49930-MLO

Chapter 13

Hon. Maria L. Oxholm

Debtor(s).

PROOF OF SERVICE

Jane Gackle, certifies that she is employed by the Law Office of Charles J. Schneider, attorney for Debtor(s), and says that on September 28, 2020, she served a copy of MOTION TO EXTEND THE AUTOMATIC STAY PURSUANT TO E.D. Mich. LBR 4001-4, AFFIDAVIT OF DEBTOR(S) to:

Thomas W. Zeiger
18496 Brentwood St.
Livonia, MI 48152

All parties indicated on the attached dated court matrix

Electronically pursuant to the court notice of service and to those not electronically registered by placing documents in an envelope, correctly addressed and placing same in the U.S. Mail with postage prepaid.

/s/ Jane Gackle
JANE GACKLE
LAW OFFICE OF CHARLES J. SCHNEIDER, P.C.
39319 Plymouth Road, Ste. 1
Livonia, MI 48150
(734) 591-4890
notices@cschneiderlaw.com

Label Matrix for local noticing
0645-2
Case 20-49930-mlo
Eastern District of Michigan
Detroit
Mon Sep 28 14:26:42 EDT 2020

American Profit Recovery
34405 West 12 Mile Road
Suite 333
Farmington Hills, MI 48331-5608

(p)CAINE & WEINER COMPANY
12005 FORD ROAD 300
DALLAS TX 75234-7262

Credit Acceptance Corp.
Attn: Officer for receipt of Process
25505 West Twelve Mile Rd.
Ste. 3000
Southfield, MI 48034-8331

Credit Acceptance Corporation
25505 W 12 Mile Rd #3000
Southfield MI 48034-8331

Enhanced Recovery Corporation
Attn: Officer for receipt of Process
8014 Bayberry rd.
Jacksonville, FL 32256-7412

Howard Alan Katz
25505 West Twelve Mile
Suite 4750
Southfield, MI 48034-8326

IC Systems Collections
PO Box 64378
St.Paul, MN 55164-0378

PRA Receivables Management, LLC
PO Box 41021
Norfolk, VA 23541-1021

(p)PORTFOLIO RECOVERY ASSOCIATES LLC
PO BOX 41067
NORFOLK VA 23541-1067

REV-1 Solutions, LLC
517 US Highway 31 N
Greenwood, IN 46142-3932

Rushmore Loan Management, LLC
15480 Laguna Canyon. Suite 100
Irvine, CA 92618-2132

David Wm Ruskin
26555 Evergreen Rd Ste 1100
Southfield, MI 48076-4251

Sattile & Barile, PLLC
7530 Lucerne Dr., Ste. 210
Middleburg, OH 44130-6557

Charles J. Schneider
39319 Plymouth Rd.
Suite 1
Livonia, MI 48150-1064

U.S. Bank Trust National Assoc as Trustee
c/o SN Servicing Corporation
323 Fifth Street
Eureka, CA 95501-0305

Thomas W. Zeiger
18496 Brentwood St.
Livonia, MI 48152-3559

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Caine & Weiner
21210 Erwin St.
Woodland Hills, CA 91367

Portfolio Recovery
PO Box 41067
Norfolk, VA 23541

End of Label Matrix	
Mailable recipients	16
Bypassed recipients	0
Total	16